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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Consolidated Case No. 3:20-cv-08570-JD

The Hon. James Donato

**DECLARATION OF AMANDA F.  
LAWRENCE IN SUPPORT OF  
ADVERTISER PLAINTIFFS' MOTION  
FOR CLASS CERTIFICATION**

Hearing Date: December 14, 2023

Hearing Time: 10:00 a.m.

Courtroom: 11, 19th Floor

1 I, Amanda F. Lawrence, declare as follows:

2 1. I am an attorney admitted pro hac vice in this action (the “Action”). I am a partner at  
3 Scott+Scott Attorneys at Law LLP, interim Co-Lead Counsel for the Advertiser Classes in the Action.  
4 I submit this declaration in support of Advertiser Plaintiffs’ Motion for Class Certification. The  
5 contents of this declaration are based on my personal knowledge, including my personal knowledge  
6 of the documents cited herein. The facts set forth herein are within my personal knowledge and if  
7 called as a witness, I could and would competently testify to them.

8 2. Attached hereto as **Exhibit 1** is a true and correct copy of a document produced by  
9 Meta Platforms, Inc. (“Meta”) in this litigation bearing the Bates-stamp PALM-012863799 and  
10 marked Plaintiffs’ Deposition Exhibit 2256.

11 3. Attached hereto as **Exhibit 2** is a true and correct copy of a document produced by  
12 Meta in this litigation bearing the Bates-stamp PALM-010629831 and marked Plaintiffs’ Deposition  
13 Exhibit 0414.

14 4. Attached hereto as **Exhibit 3** is a true and correct copy of a document produced by  
15 Meta in this litigation bearing the Bates-stamp PALM-016564836 and marked Plaintiffs’ Deposition  
16 Exhibit 2255.

17 5. Attached hereto as **Exhibit 4** is a true and correct copy of a document produced by  
18 Meta in this litigation bearing the Bates-stamp PALM-004966275 and marked Plaintiffs’ Deposition  
19 Exhibit 2862.

20 6. Attached hereto as **Exhibit 5** is a true and correct copy of a document produced by  
21 Meta in this litigation bearing the Bates-stamp PALM-004966274 and marked Plaintiffs’ Deposition  
22 Exhibit 2861.

23 7. Attached hereto as **Exhibit 6** is a true and correct copy of a document produced by  
24 Meta in this litigation bearing the Bates-stamp PALM-016175119 and marked Plaintiffs’ Deposition  
25 Exhibit 0020.

26 8. Attached hereto as **Exhibit 7** is a true and correct copy of a document produced by  
27 Meta in this litigation bearing the Bates-stamp PALM-004983975 and marked Plaintiffs’ Deposition  
28

1 Exhibit 0025.

2 9. Attached hereto as **Exhibit 8** is a true and correct copy of a document produced by  
3 Meta in this litigation bearing the Bates-stamp PALM-014640328 and marked Plaintiffs' Deposition  
4 Exhibit 0557.

5 10. Attached hereto as **Exhibit 9** is a true and correct copy of a document produced by  
6 Meta in this litigation bearing the Bates-stamp PALM-009631966 and marked Plaintiffs' Deposition  
7 Exhibit 0556.

8 11. Attached hereto as **Exhibit 10** is a true and correct copy of a document produced by  
9 Meta in this litigation bearing the Bates-stamp PALM-017114236 and marked Plaintiffs' Deposition  
10 Exhibit 1747.

11 12. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts from the  
12 Deposition of David Levenson, dated May 10, 2023.

13 13. Attached hereto as **Exhibit 12** is a true and correct copy of a document produced by  
14 Meta in this litigation bearing the Bates-stamp PALM-FTC-00246387.

15 14. Attached hereto as **Exhibit 13** is a true and correct copy of a document produced by  
16 Live Nation Worldwide, Inc. ("Ticketmaster") in this litigation bearing the Bates-stamp LN\_00076.

17 15. Attached hereto as **Exhibit 14** is a true and correct copy of a document produced by  
18 Meta in this litigation bearing the Bates-stamp PALM-010991684 and marked Plaintiffs' Deposition  
19 Exhibit 1317.

20 16. Attached hereto as **Exhibit 15** is a true and correct copy of a document produced by  
21 Meta in this litigation bearing the Bates-stamp PALM-011185287 and marked Plaintiffs' Deposition  
22 Exhibit 1320.

23 17. Attached hereto as **Exhibit 16** is a true and correct copy of a document produced by  
24 Meta in this litigation bearing the Bates-stamp PALM-008913904 and marked Plaintiffs' Deposition  
25 Exhibit 1322.

26 18. Attached hereto as **Exhibit 17** is a true and correct copy of a document produced by  
27 Meta in this litigation bearing the Bates-stamp PALM-FTC-00123557.

1 19. Attached hereto as **Exhibit 18** is a true and correct copy of a document produced by  
2 Meta in this litigation bearing the Bates-stamp PALM-008743868.

3 20. Attached hereto as **Exhibit 19** is a true and correct copy of a document produced by  
4 Meta in this litigation bearing the Bates-stamp PALM-012438844.

5 21. Attached hereto as **Exhibit 20** is a true and correct copy of a document produced by  
6 Meta in this litigation bearing the Bates-stamp PALM-002014263.

7 22. Attached hereto as **Exhibit 21** is a true and correct copy of a document produced by  
8 Meta in this litigation bearing the Bates-stamp PALM-ADI-0001000836.

9 23. Attached hereto as **Exhibit 22** is a true and correct copy of excerpts from the  
10 Deposition of Jacqueline Chang, dated April 25, 2023.

11 24. Attached hereto as **Exhibit 23** is a true and correct copy of a document produced by  
12 Meta in this litigation bearing the Bates-stamp PALM-011831146.

13 25. Attached hereto as **Exhibit 24** is a true and correct copy of a document produced by  
14 Meta in this litigation bearing the Bates-stamp PALM-006289050.

15 26. Attached hereto as **Exhibit 25** is a true and correct copy of a document produced by  
16 Meta in this litigation bearing the Bates-stamp PALM-016986654.

17 27. Attached hereto as **Exhibit 26** is a true and correct copy of a document produced by  
18 Meta in this litigation bearing the Bates-stamp PALM-008174450.

19 28. Attached hereto as **Exhibit 27** is a true and correct copy of a document produced by  
20 Meta in this litigation bearing the Bates-stamp PALM-009797163.

21 29. Attached hereto as **Exhibit 28** is a true and correct copy of a document produced by  
22 Netflix, Inc. (“Netflix”) in this litigation bearing the Bates-stamp NFLX 001582 and marked  
23 Plaintiffs’ Deposition Exhibit 0611.

24 30. Attached hereto as **Exhibit 29** is a true and correct copy of a document produced by  
25 Netflix in this litigation bearing the Bates-stamp NFLX 001590 and marked Plaintiffs’ Deposition  
26 Exhibit 0607.

27 31. Attached hereto as **Exhibit 30** is a true and correct copy of a document produced by  
28

Meta in this litigation bearing the Bates-stamp PALM-013469126 and marked Plaintiffs' Deposition Exhibit 1924.

32. Attached hereto as **Exhibit 31** is a true and correct copy of a document produced by Netflix in this litigation bearing the Bates-stamp NFLX 001586 and marked Plaintiffs' Deposition Exhibit 0614.

33. Attached hereto as **Exhibit 32** is a true and correct copy of a document produced by Netflix in this litigation bearing the Bates-stamp NFLX 001583 and marked Plaintiffs' Deposition Exhibit 0605.

34. Attached hereto as **Exhibit 33** is a true and correct copy of a document produced by Meta in this litigation bearing the Bates-stamp PALM-003207836 and marked Plaintiffs' Deposition Exhibit 0606.

35. Attached hereto as **Exhibit 34** is a true and correct copy of a document produced by Meta in this litigation bearing the Bates-stamp PALM-016919272.

36. Attached hereto as **Exhibit 35** is a true and correct copy of a document produced by Meta in this litigation bearing the Bates-stamp PALM-013499085.

37. Attached hereto as **Exhibit 36** is a true and correct copy of a document produced by Meta in this litigation bearing the Bates-stamp PALM-008530029.

38. Attached hereto as **Exhibit 37** is a true and correct copy of a document produced by Meta in this litigation bearing the Bates-stamp PALM-014546140 and marked Plaintiffs' Deposition Exhibit 0412.

39. Attached hereto as **Exhibit 38** is a true and correct copy of a document produced by Meta in this litigation bearing the Bates-stamp PALM-012193982 and marked Plaintiffs' Deposition Exhibit 1926.

40. Attached hereto as **Exhibit 39** is a true and correct copy of a document produced by Meta in this litigation bearing the Bates-stamp PALM-014736295 and marked Plaintiffs' Deposition Exhibit 0610.

41. Attached hereto as **Exhibit 40** is a true and correct copy of a document produced by

1 Meta in this litigation bearing the Bates-stamp PALM-014736296.

2 42. Attached hereto as **Exhibit 41** is a true and correct copy of a document produced by  
3 Meta in this litigation bearing the Bates-stamp PALM-013762328 and marked Plaintiffs' Deposition  
4 Exhibit 0183.

5 43. Attached hereto as **Exhibit 42** is a true and correct copy of a document produced by  
6 Meta in this litigation bearing the Bates-stamp PALM-002956298.

7 44. Attached hereto as **Exhibit 43** is a true and correct copy of a document produced by  
8 Meta in this litigation bearing the Bates-stamp PALM-014453465.

9 45. Attached hereto as **Exhibit 44** is a true and correct copy of a document produced by  
10 Meta in this litigation bearing the Bates-stamp PALM-009258488 and marked Plaintiffs' Deposition  
11 Exhibit 1704.

12 46. Attached hereto as **Exhibit 45** is a true and correct copy of a document produced by  
13 Alphabet Inc. ("Alphabet") in this litigation bearing the Bates-stamp GOOG-META-00968056 and  
14 marked Plaintiffs' Deposition Exhibit 1254.

15 47. Attached hereto as **Exhibit 46** is a true and correct copy of a document produced by  
16 Meta in this litigation bearing the Bates-stamp PALM-014465224 and marked Plaintiffs' Deposition  
17 Exhibit 1706.

18 48. Attached hereto as **Exhibit 47** is a true and correct copy of a document produced by  
19 Meta in this litigation bearing the Bates-stamp PALM-014466582 and marked Plaintiffs' Deposition  
20 Exhibit 1709.

21 49. Attached hereto as **Exhibit 48** is a true and correct copy of excerpts from the  
22 Deposition of Stephanie Wang, dated March 28, 2023.

23 50. Attached hereto as **Exhibit 49** is a true and correct copy of excerpts from the  
24 Deposition of Henry Crum, dated May 25, 2023.

25 51. Attached hereto as **Exhibit 50** is a true and correct copy of a document produced by  
26 Meta in this litigation bearing the Bates-stamp PALM-014459701 and marked Plaintiffs' Deposition  
27 Exhibit 1295.

1           52.     Attached hereto as ***Exhibit 51*** is a true and correct copy of a document produced by  
2 Alphabet in this litigation bearing the Bates-stamp GOOG-META-00968274 and marked Plaintiffs'  
3 Deposition Exhibit 1255.

4           53.     Attached hereto as ***Exhibit 52*** is a true and correct copy of a document produced by  
5 Meta in this litigation bearing the Bates-stamp PALM-013460550 and marked Plaintiffs' Deposition  
6 Exhibit 1708.

7           54.     Attached hereto as ***Exhibit 53*** is a true and correct copy of a document produced by  
8 Meta in this litigation bearing the Bates-stamp PALM-003435349 and marked Plaintiffs' Deposition  
9 Exhibit 1711.

10          55.     Attached hereto as ***Exhibit 54*** is a true and correct copy of a document produced by  
11 Meta in this litigation bearing the Bates-stamp PALM-016506616 and marked Plaintiffs' Deposition  
12 Exhibit 1712.

13          56.     Attached hereto as ***Exhibit 55*** is a true and correct copy of a document produced by  
14 Meta in this litigation bearing the Bates-stamp PALM-014435461.

15          57.     Attached hereto as ***Exhibit 56*** is a true and correct copy of a document produced by  
16 Meta in this litigation bearing the Bates-stamp PALM-003251883 and marked Plaintiffs' Deposition  
17 Exhibit 1922.

18          58.     Attached hereto as ***Exhibit 57*** is a true and correct copy of a document produced by  
19 Meta in this litigation bearing the Bates-stamp PALM-006209593 and marked Plaintiffs' Deposition  
20 Exhibit 1921.

21          59.     Attached hereto as ***Exhibit 58*** is a true and correct copy of a document produced by  
22 Alphabet in this litigation bearing the Bates-stamp GOOG-META-01836744 and marked Plaintiffs'  
23 Deposition Exhibit 1263.

24          60.     Attached hereto as ***Exhibit 59*** is a true and correct copy of a document produced by  
25 Alphabet in this litigation bearing the Bates-stamp GOOG-META-01845141 and marked Plaintiffs'  
26 Deposition Exhibit 1264.

27          61.     Attached hereto as ***Exhibit 60*** is a true and correct copy of a document produced by  
28



1 Meta in this litigation bearing the Bates-stamp PALM-014467823 and marked Plaintiffs' Deposition  
2 Exhibit 1713.

3 62. Attached hereto as **Exhibit 61** is a true and correct copy of a document produced by  
4 Meta in this litigation bearing the Bates-stamp PALM-013502367 and marked Plaintiffs' Deposition  
5 Exhibit 0463.

6 63. Attached hereto as **Exhibit 62** is a true and correct copy of a document produced by  
7 Meta in this litigation bearing the Bates-stamp PALM-003190479 and marked Plaintiffs' Deposition  
8 Exhibit 0185.

9 64. Attached hereto as **Exhibit 63** is a true and correct copy of excerpts of the Deposition  
10 of John David Jakubowski, dated April 21, 2023.

11 65. Attached hereto as **Exhibit 64** is a true and correct copy of a document produced by  
12 Meta in this litigation bearing the Bates-stamp PALM-013746413 and marked Plaintiffs' Deposition  
13 Exhibit 0464.

14 66. Attached hereto as **Exhibit 65** is a true and correct copy of a document produced by  
15 Alphabet in this litigation bearing the Bates-stamp GOOG-META-01853076 and marked Plaintiffs'  
16 Deposition Exhibit 1267.

17 67. Attached hereto as **Exhibit 66** is a true and correct copy of a document produced by  
18 Alphabet in this litigation bearing the Bates-stamp GOOG-META-02833187 and marked Plaintiffs'  
19 Deposition Exhibit 1269.

20 68. Attached hereto as **Exhibit 67** is a true and correct copy of a document produced by  
21 Meta in this litigation bearing the Bates-stamp PALM-010434436.

22 69. Attached hereto as **Exhibit 68** is a true and correct copy of a document produced by  
23 Meta in this litigation bearing the Bates-stamp PALM-010619604.

24 70. Attached hereto as **Exhibit 69** is a true and correct copy of a document produced by  
25 Meta in this litigation bearing the Bates-stamp PALM-014317772 and marked Plaintiffs' Deposition  
26 Exhibit 0119.

27 71. Attached hereto as **Exhibit 70** is a true and correct copy of excerpts from the  
28



1 Deposition of Jay Parikh, dated March 9, 2023.

2 72. Attached hereto as **Exhibit 71** is a true and correct copy of Defendant Meta Platforms,  
3 Inc.'s Supplemental Objections and Responses to Advertiser Plaintiffs' First Set of Requests for  
4 Admissions, dated May 23, 2023.

5 73. Attached hereto as **Exhibit 72** is a true and correct copy of excerpts from the  
6 Deposition of Rob Goldman, dated June 13, 2023.

7 74. Attached hereto as **Exhibit 73** is a true and correct copy of excerpts from the  
8 Deposition of David Fischer, dated April 19, 2023.

9 75. Attached hereto as **Exhibit 74** is a true and correct copy of excerpts from the  
10 Deposition of Jonathan Eide, dated May 9, 2023.

11 76. Attached hereto as **Exhibit 75** is a true and correct copy of webpage entitled "About  
12 Ad Auctions," located on Meta's Business Help Center website (PDF version created September 13,  
13 2023).

14 77. Attached hereto as **Exhibit 76** is a true and correct copy of a document produced by  
15 Meta in this litigation bearing the Bates-stamp PALM-002742415.

16 78. Attached hereto as **Exhibit 77** is a true and correct copy of a document produced by  
17 Meta in this litigation bearing the Bates-stamp PALM-013000862.

18 79. Attached hereto as **Exhibit 78** is a true and correct copy of a document produced by  
19 Meta in this litigation bearing the Bates-stamp PALM-012852142

20 80. Attached hereto as **Exhibit 79** is a true and correct copy of the Advertiser Class  
21 Rebuttal Report of Catherine Tucker, dated August 4, 2023.

22 I declare under penalty of perjury under the laws of the United States of America that the  
23 foregoing is true and correct. Executed on this 15th day of September, 2023 at Colchester,  
24 Connecticut.

25 /s/Amanda F. Lawrence  
26 Amanda F. Lawrence  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on September 15, 2023, I caused a true and correct copy of the foregoing document to be served by electronic mail on all counsel of record.

Dated: September 15, 2023

By: /s/Amanda F. Lawrence  
Amanda F. Lawrence

**EXHIBIT 1**  
**[Filed Under Seal]**

**EXHIBIT 2**  
**[Filed Under Seal]**

**EXHIBIT 3**  
**[Filed Under Seal]**

**EXHIBIT 4**  
**[Filed Under Seal]**

**EXHIBIT 5**  
**[Filed Under Seal]**



**EXHIBIT 6**  
**[Filed Under Seal]**

**EXHIBIT 7**  
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**EXHIBIT 8**  
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**EXHIBIT 9**  
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**EXHIBIT 10**  
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**EXHIBIT 11**  
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**EXHIBIT 12**  
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**EXHIBIT 13**  
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**EXHIBIT 20**  
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**EXHIBIT 27**  
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**EXHIBIT 35**  
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**EXHIBIT 43**  
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**EXHIBIT 51**  
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**EXHIBIT 67**  
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**EXHIBIT 72**  
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**EXHIBIT 73**  
**[Filed Under Seal]**

**EXHIBIT 74**  
**[Filed Under Seal]**



## **EXHIBIT 75**

## About ad auctions | Meta Business Help Center

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 [facebook.com/business/help/430291176997542](https://www.facebook.com/business/help/430291176997542)

# Meta Business Help Center



We use an ad auction to determine the best ad to show to a person at a given point in time. The winning ad maximizes value for both people and businesses. Understanding the ad auction can help you understand your ad performance.

### When do ad auctions take place?

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Each time there's an opportunity to show an ad to someone, an auction takes place to determine which ad to show to that person. Billions of auctions take place everyday across the Facebook family of apps.

### Who competes in each auction?

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When advertisers create ads, they tell us who they want to show their ads to by defining a target audience. A person can fall into multiple target audiences. For example, one advertiser targets women who like skiing, while another advertiser targets all skiers who live in California. The same person (in this case, a female skier who lives in California) could fall into the target audience of both advertisers.

When there's an opportunity to show someone an ad, the ads with a target audience that the person belongs to are eligible to compete in the auction.

## How is the winner of the auction determined?

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To ensure that the winning ad maximizes value for both people and businesses, the winner of the auction is the ad with the highest **total value**. The total value is a combination of 3 major factors:

- **Bid**: The bid placed by an advertiser for that ad (in other words, what the advertiser is willing to pay to achieve their desired outcome). There are multiple ways to manage your bid in the ad auction. To learn more, see [About bid strategies](#).
- **Estimated action rates**: An estimate of whether a particular person engages with or converts from a particular ad (in other words, the probability that showing an ad to a person leads to that desired outcome of the advertiser). **Note**: Engaging in clickbait and engagement bait does not improve ad performance.
- **Ad quality**: A measure of the quality of an ad as determined from many sources including feedback from people viewing or hiding the ad and assessments of low-quality attributes in the ad, such as withholding information, sensationalized language and engagement bait.

Together, estimated action rates and ad quality measure ad relevance. Because these are components of the auction, an ad that's more relevant to a person could win an auction against ads with higher bids. Use ad relevance diagnostics to diagnose whether the ads you ran were relevant to the audience you reached.

We may use data about you and your ad account to make adjustments that could affect auction outcomes and prices, such as to improve ad quality and relevance, test or support ad types and ad products, optimize the auction or comply with the law, enforce our terms, policies and other standards including fostering a safe and trustworthy environment on our platform. But we won't charge you more than your bid to show your ad. To learn more about tools to manage your ad spending, see [About budgets](#) and [About cost and bid controls](#).

**EXHIBIT 76**  
**[Filed Under Seal]**

**EXHIBIT 77**  
**[Filed Under Seal]**

**EXHIBIT 78**  
**[Filed Under Seal]**

**EXHIBIT 79**  
**[Filed Under Seal]**